

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: AETNA UCR LITIGATION

MDL No. 2020

Master File No. 2:07-cv-3541 (FSH)(PS)

This Document Relates To: ALL CASES

**AETNA’S SUPPLEMENTAL AND AMENDED ANSWERS AND OBJECTIONS TO
PLAINTIFFS’ FIRST SET OF INTERROGATORIES
(INTERROGATORY NOS. 10, 11, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, and 26)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, the Local Rules for the District of New Jersey, and the Court’s Pretrial Scheduling Order, Defendants Aetna Health Inc. PA, Corp., Aetna Health Management, LLC, Aetna Life Insurance Co., Aetna Health and Life Insurance Co., Aetna Health Inc., and Aetna Insurance Co. of Connecticut (“Aetna”) hereby provide supplemental and amended answers and objections to Request Nos. 10, 11, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, and 26 from Plaintiffs’ First Set of Interrogatories. Aetna reserves the right to amend, supplement, and correct its responses as necessary.

GENERAL OBJECTIONS

1. Aetna objects to each and every Interrogatory, Definition, and Instruction on the ground that Plaintiffs lack standing to pursue the relief that they purport to seek, individually and on behalf of the putative class alleged in the Joint Consolidated Amended Complaint. Aetna’s responses are subject to and without waiver of this objection and Aetna’s arguments in its motion to dismiss that the Joint Consolidated Amended Complaint should be dismissed in its entirety.

2. Aetna objects to each and every Interrogatory, Definition, and Instruction to the

claims systems, ACAS and the HMO system, Aetna refers Plaintiffs' to its claim data productions for 2001 through 2008 (*see* AET-00126710-00126711, AET-00126713, AET-00297211, AET-00500964-00500967, and AET-00701465-00701472).

INTERROGATORY NO. 11:

Describe all scrubs, profiling, algorithms, use of any prior year's data, edits, pre-edits, changes or modifications made by Aetna to Ingenix Data Contributions. Provide dates for each change.

AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11:

Aetna hereby incorporates its General Objections and Objections to Definitions and Instructions in their entirety into this response. Aetna further objects to this Interrogatory as vague, ambiguous, overly broad, and unduly burdensome. By way of example only, Aetna objects on the ground that the terms "scrubs," "profiling," "algorithms," "use of any prior year's data," "edits," "pre-edits," "changes," and "modifications" make this Interrogatory vague, ambiguous, overly broad, and unduly burdensome.

Subject to and without waiving the General Objections, the Objections to Definitions and Instructions, or the foregoing specific objections, Aetna refers Plaintiffs to Aetna's document production, including documents bearing Bates-numbers AET-00820114-00820120, AET-00685958-00685988, AET-00682192-00682196, AET-01342036-01342101, AET-01339016-01339082, AET-01342103-01342184, AET-01346046-01346130, AET-01074571-01074573, AET-03445502-03445505, AET-01201186-01201202, and AET-C00103222-00103236.

INTERROGATORY NO. 14:

Describe chronologically from 2001 all Complaints by regulators or Aetna Members Concerning UCR, including their disposition.